

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-mj-8604-RMM

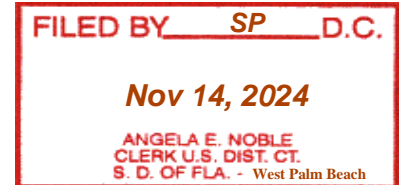
UNITED STATES OF AMERICA

v.

KYLE RAY WILSON,

Defendant.

/



CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? NO
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? NO
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? NO
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? NO

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: /s/ Alexandra Chase
ALEXANDRA CHASE
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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

KYLE RAY WILSON

Case No.

24-mj-8604-RMM

*Defendant(s)*FILED BY SP D.C.

Nov 14, 2024

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - West Palm Beach

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 1, 2023 to present in the county of Palm Beach in the
Southern District of Florida, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 2251

Sexual exploitation of children

18 U.S.C. 2422

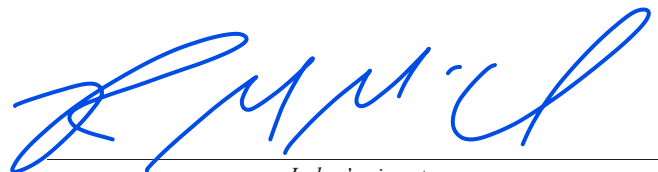
Enticement of a minor

This criminal complaint is based on these facts:

Please see the attached affidavit of Special Agent Marisa Morris, Federal Bureau of Investigation ("FBI"), incorporated herein by reference.

☒ Continued on the attached sheet.Sworn and attested to me by
applicant by telephone (FaceTime) per
the requirements of Fed. R. Crim. P.
4(d) and 4.1*Marisa Morris**Complainant's signature*

Marisa Morris, Special Agent, FBI

*Printed name and title*Date: 11/14/2024City and state: West Palm Beach, Florida*Judge's signature*

Hon. Ryon M. McCabe, U.S. Magistrate Judge

Printed name and title

COMPLAINT AFFIDAVIT

1. I am a Special Agent with the Miami Division of the Federal Bureau of Investigation (“FBI”) and have held this position since April 2021. I am currently assigned to the FBI Miami Division’s West Palm Beach Resident Agency. Before becoming an FBI Special Agent, I worked for the FBI as a Staff Operations Specialist from September 2017 to December 2020 where I investigated threats to national security. I also hold a Bachelor of Arts degree as well as a Bachelor of Science degree from the University of Connecticut. I am a law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code. That is, I am an officer of the United States, who is empowered by law to conduct investigations of and make arrests for, offenses enumerated in Title 18, United States Code.

2. My current responsibilities include conducting federal investigations of violations involving crimes against children and human trafficking. As part of my responsibilities, I investigate crimes involving the sexual exploitation of minors, to include but not limited to, sex trafficking of minors, child pornography, and online enticement violations. I have received training on the proper investigative techniques for these violations, including the application and execution of arrest and search warrants.

3. This affidavit is based upon my own personal knowledge of the facts and circumstances surrounding the investigation and information provided to me by other law enforcement officers. This affidavit does not purport to contain all the information known to me about this case, but addresses only that information necessary to support a finding of probable cause for the issuance of a criminal complaint charging KYLE RAY WILSON with violations of 18 U.S.C. §§ 2251 (sexual exploitation of children) and 2422 (enticement of a minor).

PROBABLE CAUSE

4. On or about June 26, 2023, a minor victim (hereinafter referred to as “Minor Victim 1”), year of birth 2007, provided an online report to the FBI National Threat Operations Center, stating a man she identified as KYLE RAY WILSON coerced her into sending naked pictures to him online.

5. On or about August 8, 2023, an FBI Child and Adolescent Forensic Interviewer (CAFI) interviewed Minor Victim 1. During the CAFI interview, Minor Victim 1 stated WILSON had approached Minor Victim 1 and her cousin through the online social networking application TikTok. Minor Victim 1’s social media account profile identified she was 15 years’ old at the time. Minor Victim 1 had a “LIVE”¹ post, which WILSON joined. After Minor Victim 1 thanked WILSON for joining the “LIVE”, WILSON began to message Minor Victim 1. After their first online encounter through TikTok, WILSON and Minor Victim 1 continued to message and video chat each other. They began using the Snapchat application to communicate as well. Through approximately four months of communication, WILSON initially told Minor Victim 1 he was 15 years old. WILSON later stated he was 19 years old, and then ultimately told Minor Victim 1 he was 39 years old.

6. Minor Victim 1 further explained to the CAFI that WILSON began asking for nude photos of Minor Victim 1’s body, including her breasts, rear, and vagina. Additionally, WILSON messaged Minor Victim 1 photos of his penis on Snapchat on at least two occasions. All nude photos between WILSON and Minor Victim 1 were sent via the Snapchat application. Minor Victim 1 explained the pictures she took of herself were taken in her bedroom. WILSON asked Minor Victim 1 to send a video of Minor Victim 1 masturbating with her fingers, to which Minor

¹ Tiktok LIVE is a feature on the TikTok application which allows users to broadcast themselves in real time to their followers and the TikTok community. Viewers can interact with creators in real time through comments and questions.

Victim 1 complied and sent. Additionally, WILSON requested a video of Minor Victim 1 using a hairbrush to masturbate, but Minor Victim 1 did not comply.

7. Minor Victim 1 explained that when they engaged in video calls at WILSON's request, WILSON normally kept his camera off. WILSON would get mad at Minor Victim 1 if she hung up on these calls, or if her phone battery died. When WILSON got mad, he would yell, curse, and call Minor Victim 1 derogatory names. At one point, WILSON became angry with Minor Victim 1 and demanded that Minor Victim 1 give WILSON her telephone number outside of social media. Minor Victim 1 reported WILSON's telephone number as ***-***-2764. One time, WILSON told Minor Victim 1 he wanted to meet Minor Victim 1 near her house in the area of Boyd Hill, Florida, in the Middle District of Florida. WILSON offered to buy breakfast or dinner for Minor Victim 1 and told Minor Victim 1 he wanted to have sex with her in a bathroom. WILSON sent Minor Victim 1 a screenshot of the proposed location after looking at the "Maps" portion of the Snapchat application which allowed users to see their locations as well as the location of others, depending on user settings.

8. Minor Victim 1 told the CAFI she saw WILSON's face approximately two (2) times while video-chatting when he did not have his camera turned off. Minor Victim 1 thought WILSON looked like he could be 39 years old, and described him as bald, with gray stubble on his face, and with tattoos of a bomb and a spider. On another occasion, WILSON showed Minor Victim 1 his business card, which Minor Victim 1 described as being red and black with ants on it. The business card also had the name, Kyle Ray WILSON on it, and showed WILSON had 18 years of experience.

9. On or about August 9, 2023, the FBI obtained information from T-Mobile for subscriber records relating to telephone number ***-***-2764. T-Mobile provided the telephone

number to be associated with the name “Eleven Eleven” and address, 17504 36th Court North, Loxahatchee, Florida (Target Premises). A check of Florida’s Driver and Vehicle Information Database (D.A.V.I.D.) for the Target Premises revealed a licensed driver, KYLE RAY WILSON, year of birth 1983. That same day, law enforcement officers sent a photo of WILSON to Minor Victim 1’s father to show to Minor Victim 1. The father advised that Minor Victim 1 knew the photograph to depict WILSON, the person she had described to the CAFI.

10. On or about August 30, 2023, the FBI received information from Snap Inc. relating to accounts associated with telephone number ***-***-2764. Snap Inc. provided telephone number ***-***-2764 was associated with an account which had a creation IP address of 73.46.225.205 and username, “bean234021.”

11. On or about September 14, 2023, the FBI received information for the subscriber of IP address 73.46.225.205, owned by Comcast, which revealed the IP address had a service address of the Target Premises under subscriber name “R.P.”

12. In approximately March 2024, your affiant received information that the Village of DeForest Police Department in Wisconsin had separately investigated WILSON’s known telephone number, ***-***-2764. On approximately March 13, 2024, your affiant contacted a Village of DeForest Police Department Detective who advised he had investigated a subject related to a minor victim, Minor Victim 2. During his investigation, the Detective had come across chat messages between Minor Victim 2 and a contact saved in Minor Victim 2’s phone as “Ky” with telephone number ***-***-2764. This is a similar name to WILSON and the same phone number provided by Minor Victim 1. A search of Minor Victim 2’s cell phone identified chats between Minor Victim 2 and WILSON’s phone number which were captured by the Village of DeForest

Police Department Detective. “Ky” provided a photo in the messages, which matches s matches the appearance of the photo of WILSON available in Florida’s D.A.V.I.D.

13. Also in March 2024, law enforcement officers conducted a queried Google for the Target Premises, which revealed a business named “Kyle’s Pest Control” as associated with that address. The phone number for Kyle’s Pest Control was listed as ***-***-8254.

14. On March 19, 2024, the FBI received T-Mobile records associated with telephone number, ***-***-8254. T-Mobile provided that telephone number’s subscriber as “PC Elevens” with service address of the Target Premises.

15. On or about March 19, 2024, the FBI obtained toll records for the two telephone numbers believed to be associated with WILSON: ***-***-2764 and ***-***-8254. Toll record analysis revealed these numbers had been in communication with multiple other telephone numbers, some of which were associated with minor females. Subsequently, your Affiant sent leads to other FBI Divisions to request CAFI interviews of the minor females.

16. Minor Victim 3, year of birth 2008, participated in a CAFI interview on May 31, 2024 near her residence of Piqua, Ohio. Minor Victim 3 disclosed to the CAFI that she and WILSON began talking when Minor Victim 3 was a freshman in high school. WILSON added Minor Victim 3 on Snapchat initially. WILSON and Minor Victim 3 communicated via the message and call features of Snap. At the time, Minor Victim 3 told WILSON she was 14 years old. WILSON told Minor Victim 3 he was 18, and later shared was 33 years old. On multiple occasions, WILSON requested nude photos from Minor Victim 3, specifically depicting her breasts and vagina, but Minor Victim 3 did not comply. WILSON sent Minor Victim 3 a photo of himself, and Minor Victim 3 then blocked WILSON’s account. During the CAFI interview, Minor Victim 3 positively identified a photo of WILSON as the individual she communicated with online.

Minor Victim 3 also identified additional Snapchat accounts associated with WILSON, including “freaky22012”, “giggity_goo2023”, and “mrniceguy11.22”.

17. The FBI received subscriber information relating to Snap Inc. account username, “mrniceguy11.22” on approximately June 24, 2024. Snap Inc. provided that prior to April 29, 2024, “mrniceguy11.22” was associated with telephone number ***-***-8254, and a display name of “Kyle Wilson.”

18. Minor Victim 4, year of birth 2010, participated in a CAFI interview on July 2, 2024 near her residence of Des Moines, Iowa. Minor Victim 4 disclosed that she was approximately 11 or 12 years old when she first began speaking to a man named “Kyle” on Snap. The display name for Kyle included the words “nice guy” but Minor Victim 4 could not remember the exact username. “Kyle” told Minor Victim 4 he was 15 years old, had dropped out of high school, and worked with his dad. “Kyle” sent Minor Victim 4 a photo of his penis which Minor Victim 4 described as a picture of a penis, legs, and a bathroom which appeared to be a public restroom stall. Minor Victim 4 blocked “Kyle” from contact in response to the photo. “Kyle” then text messaged an acquaintance of Minor Victim 4 request the acquaintance relay to Minor Victim 4 to unblock “Kyle”. Minor Victim 4 did not know how “Kyle” knew to contact the acquaintance to get to Minor Victim 4

19. Minor Victim 5, year of birth 2011, participated in a CAFI interview on August 13, 2024 near her residence of Grand Rapids, Michigan. Minor Victim 5 informed the CAFI that a man Minor Victim 5 knew as “Kyle” added her on Snapchat a few years ago, when Minor Victim 5 was approximately 12 years old. Minor Victim 5 and “Kyle” talked to each other about their hobbies, and “Kyle” shared he liked playing video games or going to work. Minor Victim 5 told “Kyle” she enjoyed watching television. Sometimes during voice calls, Minor Victim 5 thought

“Kyle” was in a truck with a friend because Minor Victim 5 could hear the engine running in the background. On at least one occasion, “Kyle” told Minor Victim 5 he was with a friend while they spoke. Minor Victim 5 could not remember how “Kyle” got her phone number. “Kyle” initially told Minor Victim 5 that he was 13 or 14 years old, but then later shared he was 15 or 16 years old. Eventually “Kyle” told Minor Victim 5 he might be older than 16 years old. Minor Victim 5 and her friend video-chatted with “Kyle” a few times, but Minor Victim 5 thought it was strange that he never turned his camera on. Minor Victim 5 believed that “Kyle” sounded like an adult. Minor Victim 5 thought “Kyle” wanted to be Minor Victim 5’s boyfriend, because “Kyle” kept attempting to talk to Minor Victim 5 and told Minor Victim 5, “maybe I could date you for a day”. After some time, Minor Victim 5 blocked “Kyle’s” phone number as well as on Snap.

20. Surveillance of the Target Premises on August 13, 2024 identified multiple vehicles parked in the curtilage, including a red and black work truck inscribed with “Empire Pest Defense” (Target Vehicle).

21. A Florida D.A.V.I.D check as of November 8, 2024 revealed WILSON resides at the Target Premises with two other individuals. D.A.V.I.D records do not show any vehicles registered to WILSON, and revealed the Target Vehicle is registered to Empire Pest Defense LLC. According to D.A.V.I.D., Empire Pest Defense LLC has three vehicle registrations, including the Target Vehicle, a 2022 Ram van, and a 2017 trailer.

22. A query of the Florida Department of Agriculture and Consumer Services License Pesticide Applicator Search tool on November 5, 2024 revealed WILSON maintains License Number JE173957 under a company named, Empire Pest Defense LLC.

23. On November 8, 2024, representatives of the U.S. Postal Service stated that WILSON has received packages at the Target Premises as recently as August 12, 2024.

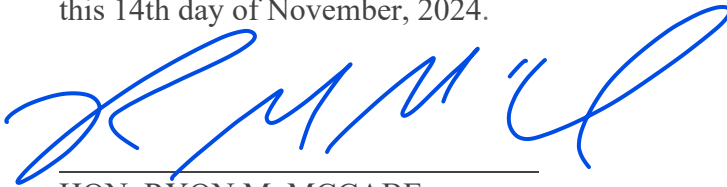
24. Based on the foregoing, I have probable cause to believe that KYLE RAY WILSON has conducted activities in violation of 18 U.S.C. §§ 2251 (sexual exploitation of children) and 2422 (enticement of a minor) since at least June 2023.

Further Affiant Sayeth Naught

Marisa Morris

Marisa Morris, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me by applicant
by telephone (FaceTime) per the requirements of
Fed. R. Crim. P. 4(d) and 4.1
this 14th day of November, 2024.



HON. RYON M. MCCABE
UNITED STATES MAGISTRATE JUDGE